

Memorandum

Date: January 4, 2008

To: Bill Wilson, NPFMC Staff

From: Frank Kelty, City of Unalaska, for UNFA

Subject: Statement on SSLMC goals and objectives on UNFA Proposal #13 the Bogoslof Island Pacific Cod Exemption Area.

Goals

- We feel UNFA proposal #13 continues to meet the goals of the SSLMC as well as the ESA, MMPA, MSFCMA, and other applicable laws. This proposal makes only a small increase in the Pacific Cod TAC for the exemption area in the 500 to 600 metric ton range. The proposal will help sustain the local Unalaska small boat fixed gear vessels that fish this area and are home-ported in Unalaska.


Objectives

1. Continue to avoid jeopardy and adverse modification.

- There may be more fishing effort and more fishing days inside of SSL critical habitat, but not on a large scale we expect only 500 to 600MT increase in TAC for the Bogoslof exemption area.
- The proposal does not include provide any trade-offs to reduce the effects to SSL.
- The proposal does not open any additional amount of critical habitat.
- The proposal does not provide protection to additional SSL sites.
- The proposal does not affect nearby SSL sites, there are no haul outs or rookeries inside the Pacific Cod Bogoslof exemption area.
- The proposal does not impact research sites.
- The proposal does not offer measures to control fishing rate or effort, but this area is for fixed gear vessels only under 60' < that have a slower rate of catch and we are seeing more pot gear being used in the cod fishery that have lower rates of bycatch.
- The proposal does affect a SSL site of special importance.
- The proposal may increase the no-fishing time between the end of the year and first part of January due to the fact that many of the 60' < fixed gear vessels don't start fishing until later in January or early February in the Unalaska Island area.
- The proposal does not shift effort into a time/space or prey availability level that may have negative effect on SSL due to the small amount of TAC for this area under 800MT for the 60' < fishery.

- The proposal with a proposed TAC increase will increase the fishing days required to harvest the quota in the Bogoslof exemption area.
2. Encourage development of a sound experimental design for monitoring.
 - The proposal does not address this issue.
 3. Minimize adverse social and economic impacts.
 - The proposal does provide economic benefits to the local Unalaska 60' < fixed gear fleet, the local processing plants and community of Unalaska as a whole through fish tax revenues as well as goods and services purchased by this fleet from the local support sector businesses.
 - This proposal with and increase in TAC for this area will encourage more effort by the local fleet to fish this area and will create more interest from the Unalaska processing facilities in working with and purchasing fish from the local fixed gear fleet. This has been an issue in the past for the local small boat fleet that felt they didn't get a fair shake at times by the large processing plants locally.
 - I don't believe this proposal will affect other fisheries.
 - I don't believe this proposed action will be further impacted by pending NPFMC action.
 4. Minimize bycatch of PSC and other groundfish.
 - This proposal shouldn't increase bycatch of PSC and other groundfish, most of the Pacific Cod in the exemption area will be harvested by pot gear which has one of the lowest rates of bycatch.
 - We believe this proposal will not increase bycatch of PSC species in the exemption area.
 5. Promote safety at sea.
 - We believe safety will improve, the exemption area provides a fishing area close to protected waters and the community of Unalaska where the vessels are home-ported and sell their catch.
 6. Minimize adverse impacts to threatened and endangered species in the BSAI and GOA.
 - This proposal does not minimize impacts to threatened and endangered species in the BSAI. But this proposal affects such a small amount of TAC and is a fishery for fixed gear vessels under 60' < that it shouldn't have a major impact on SSL even with increased fishing days in this area.

Regards

A handwritten signature in black ink, appearing to be 'Frank Kelty', written over a horizontal line.

Frank Kelty
City of Unalaska/ UNFA